



### Statement

The Citizens for National Security (CNS) commends the Department of Energy (DOE) for issuing the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant. When completed, this environmental impact statement will serve as a solid foundation from which to "tier" future actions at the Y-12 Plant.

CNS was the first organization to call for the modernization of the Y-12 Plant and to publicly urge DOE to move aggressively to initiate preparation of a Y-12 Plant SWEIS.

Our membership, which comprises both active and retired members of the Y-12 workforce, former DOE employees and members of the surrounding communities, have followed the National Environmental Policy Act proceedings that impact the Y-12 Plant with keen interest. We provided hundreds of written and oral technical comments on the Preliminary Environmental Impact Statement on the Stockpile Stewardship and Management Program. We are confident that this was the largest group of technically competent reviewers to critically read that DOE Environmental Impact Statement. From the level of our participation at the two public scoping meetings on April 13, 1999 and from our attendance at these sessions today, you can anticipate a similar level of interest in the Y-12 Draft SWEIS.

We recognize that the present Y-12 Draft SWEIS was subjected to DOE review and may have had some delay. However, the National Nuclear Security Administration (NNSA) was created on March 1, 2000 fully nine months before the December, 2000 publication of the Y-12 Draft SWEIS. It is especially significant that the NNSA was established by Congress to manage the nation's nuclear weapons complex. Clearly, the Congress intends that the NNSA focus solely on ensuring that the U.S. nuclear deterrent remains safe, secure and reliable.

Modernization of the Y-12 Plant is a significant step in achieving that Congressional intent. It is the responsibility of DOE to fully explain the roles and responsibilities of the NNSA in the Final Y-12 SWEIS. From the Draft Y-12 SWEIS, the public has no way of judging who is responsible for the ROD. As an example of our confusion, the letter from Mr. Brumley states that this is a NNSA Environmental Impact Statement but refers comments to DOE Oak Ridge Operations. We will look forward to a clear explanation of these relationships in the Final Y-12 SWEIS.

Again, we commend DOE for issuing this Draft SWEIS and appreciate this opportunity to comment.

*A Forceful Voice on Behalf of the Y-12 Plant*

1/26

### Comment No. 1

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The National Nuclear Security Administration is a separately organized agency within DOE responsible for maintaining the safety and reliability of the U.S. nuclear weapons stockpile. NNSA prepared the Site-wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 National Security Complex (DOE/EIS-0309) and the Secretary of Energy will issue the Record of Decision (ROD). Additional information about the NNSA and its relationship to DOE can be found in Chapter 1, Section 1.1.1.